

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,)	
)	
Plaintiff,)	
v.)	C.A. No. 1:21-cv-01456-MN
)	
CHANBOND, LLC, DEIRDRE LEANE,)	
and IPNAV, LLC,)	
)	
Defendants.)	

**DEIRDRE LEANE AND IPNAV, LLC’S
UNOPPOSED MOTION TO FILE UNDER SEAL**

Defendants Deirdre Leane and IPNAV, LLC (collectively, the “Leane Defendants”) respectfully move this Court pursuant to Federal Rule of Civil Procedure 5.2, and Local Rule 5.1.3 for entry of an order authorizing the Leane Defendants to file their Answer to Plaintiff CBV, Inc.’s (“CBV”) First Amended Complaint (D.I. 6) (including any counterclaims or crossclaims the Leane Defendants assert pursuant to Federal Rule of Civil Procedure 13) under seal. Plaintiff CBV and Defendant ChanBond, LLC do not oppose this relief.

On October 15, 2021, CBV filed a Motion to Seal the Complaint (D.I. 1). The Court granted CBV’s Motion to Seal on October 15, 2021 (D.I. 4). CBV subsequently filed a First Amended Complaint (D.I. 6) on December 6, 2021 under seal. The First Amended Complaint sets forth information regarding the parties’ confidential business information. The Leane Defendants’ Answer to the First Amended Complaint will contain the same or similar confidential information. Accordingly, the Leane Defendants respectfully submit that good cause exists to seal their Answer to First Amended Complaint (including any counterclaims or crossclaims the Leane Defendants assert pursuant to Federal Rule of Civil Procedure 13) to protect the interests of one or more parties against public dissemination of the confidential

information contained within the Leane Defendants' Answer to First Amended Complaint, counterclaims, and/or crossclaims.

The Leane Defendants will comply with all applicable local rules and procedures regarding filing under seal through the Court's CM/ECF system, including the requirement to file a redacted version within seven (7) days of filing the sealed document.

The Leane Defendants therefore respectfully request entry of the attached order permitting the filing of their Answer to CBV's First Amended Complaint, and any counterclaims or crossclaims that they may file pursuant to Federal Rule of Civil Procedure 13, under seal.

OF COUNSEL:

Akiva M. Cohen
Dylan M. Schmeyer
KAMERMAN, UNCYK,
SONIKER & KLEIN P.C.,
1700 Broadway, 16th Floor
New York, NY 10019
212.400.4930
acohen@kusklaw.com
dschmeyer@kusklaw.com

Dated: March 22, 2022

Respectfully submitted,

/s/ James H. S. Levine
James H. S. Levine (DE No. 5355)
TROUTMAN PEPPER
HAMILTON SANDERS LLP
Hercules Plaza, Suite 5100
1313 N. Market Street
P.O. Box 1709
Wilmington, DE 19899-1709
302.777.6500
james.levine@troutman.com

Attorneys for IPNAV, LLC and Deirdre Leane

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2022, I filed the foregoing Deirdre Leane and IPNAV, LLC's Unopposed Motion to File Under Seal using CM / ECF, which will send notification of such filing to all counsel of record.

/s/ James H. S. Levine
James H. S. Levine (DE No. 5355)